



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 21, 2012

Holly Jewkes, District Ranger
Crescent Ranger District
Deschutes National Forest
PO Box 208
Crescent, Oregon 97756

RE: EPA Region 10 Comments on the Rim-Paunina Project Draft Environmental Impact Statement.
EPA Project Number: 09-025-AFS.

Dear Ms. Jewkes:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Rim-Paunina Project on the Crescent Ranger District of the Deschutes National Forest in Klamath County, Oregon. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The DEIS analyzes the Forest Service's proposal to implement treatments that would create and maintain a diversity of habitats closer to the historic array within the project area. Management Indicator Species of focus are white-headed, black-headed, and three-toed woodpeckers; accipiter hawks; big game (deer and elk); and American marten. A No Action Alternative and four action alternatives are considered in the DEIS. The preferred alternative (Alternative E) would pursue a variety of density reduction activities on 12,441 acres and prescribed burning on 13,490 acres. Approximately 8.3 miles of temporary road would need to be constructed in order to implement the preferred alternative.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be clear, well organized, and robust. We are pleased by the Forest's responsiveness to issues raised during the scoping process through the development of Alternative E as the preferred alternative. We support the approach in Alternative E as it addresses Key Issue #2 (dwarf mistletoe infection in ponderosa pine-dominated stands) while maintaining important structural elements.

We also appreciate the cumulative effects analysis related to road and trail use. In our scoping comments we raised a question about the Three Trails OHV Project, which will designate a motorized trail system within an area that overlaps the Rim-Paunina Project area. Based on the analysis provided, we are satisfied there would be no additional or additive effect associated with roads within the area of overlap.

As the Forest moves forward with development of the Final EIS, we offer one recommendation related to the characterization of monitoring within the EIS. The DEIS notes on page 25 that determination of what monitoring would be necessary is part of the decision framework, but the document does not go on to describe the monitoring program. We acknowledge that references to past and ongoing monitoring are

interwoven throughout the document, but we believe it would be helpful to provide consolidated information about project level monitoring that will be pursued in order to assess impacts from the project, and the implementation and effectiveness of measures taken to mitigate impacts. A recent example of a site specific monitoring discussion within an EIS can be found in the Ogden Landscape Vegetation Management Project DEIS¹. Incorporating this information into the FEIS will place the Forest in a position to identify and pursue adaptive management measures as appropriate. It will also ensure compliance with the Council on Environmental Quality's recent Final Guidance on the Appropriate Use of Mitigation and Monitoring². That guidance affirms that agencies should monitor the implementation and effectiveness of mitigation commitments; make information on mitigation monitoring available to the public, preferably through agency web sites; and remedy ineffective mitigation when the Federal action is not yet complete.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this and other projects as we continue to participate on the Provincial Advisory Committee. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at reichgott.christine@epa.gov, Or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov .

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

¹ http://www.fs.fed.us/nepa/nepa_project_exp.php?project=31006

² http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf